



STINSON
MORRISON
HECKER LLP

10/2/05
Douglas Y. Curran
(816) 691-3113
dcurran@stinsonmoheck.com
www.stinsonmoheck.com

1201 Walnut, Suite 2900
Kansas City, MO 64106-2150

Tel (816) 842-8600
Fax (888) 391-9749

October 7, 2005



Tom Turner
Associate Regional Counsel
U.S. EPA – Region V
Office of Regional Counsel (C-14J)
77 W. Jackson Boulevard
Chicago, IL 60604

Re: Clayton Chemical Site (IL)

Dear Mr. Turner:

Elementis Chemicals Inc. is in receipt of EPA's September 27, 2005 notice letter regarding the above-referenced site. Please be advised that Elementis Chemicals Inc. f/k/a Harcros Chemicals Inc. f/k/a Thompson Hayward Chemical Company is a Non-Performing Respondent at this site. On September 30, 2005, Sharon Newlon sent you a copy of this entity's fully-executed signature page.

I believe this response fully addresses the issues raised in EPA's September 27 letter. If EPA has any further questions or requires additional information, do not hesitate to contact the undersigned.

Very truly yours,

STINSON MORRISON HECKER LLP

Douglas Y. Curran

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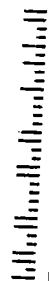
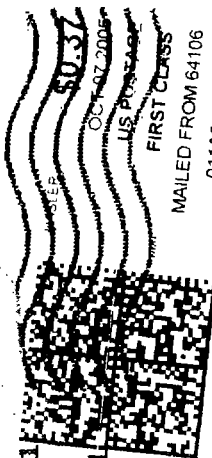


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1201 Walnut • Suite 2900 • Kansas City, MO 64106-2150

KANSAS CITY 641-661

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